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September 8, 2022

VIA ECF

Hon. Gary R. Brown
EDNY District Judge
100 Federal Plaza, Courtroom: 940
Central Islip, NY 11722

Re: Rodriguez, v. Williams-Sonoma, Inc., Civil Action No.: 22-cv-02436-GRB-JMW

Dear Judge Brown,

We represent Defendant Williams-Sonoma, Inc. in the above-referenced matter. Pursuant to Your Honor's Individual Practices in Civil Cases, we write with two separate requests.

First, we write *with the consent of counsel for Plaintiff Gabriel Rodriguez* ("Plaintiff"), to respectfully request that the Court grant Defendant a short, two-week extension of time to serve its forthcoming Motion to Dismiss, from September 16, 2022 to September 30, 2022. In light of this request, we further ask that Plaintiff's opposition be due on or before October 31, 2022, and Defendant's Reply be due on or before November 14, 2022. This extension, *to which Plaintiff consents*, will not impact any other scheduled dates in this matter. This is Defendant's first request for an extension of time to serve its Motion to Dismiss.

Separately, Defendant writes to respectfully request that the Court extend the page limitation for Defendant's memoranda in support of its Motion to Dismiss from 20 pages to 30 pages. Plaintiff does not consent to this request because he believes "the arguments for dismissal raised in the pre-motion letter have already been pared down from 4 to 1" and the Court has indicated "it is receiving briefing on this same issue in at least one other matter." Defendant, however, believes the additional pages are necessary given the complex legal issues involved, and the extensive legislative history surrounding the applicable statutes. Defendant believes that the few additional pages will allow it to present its position more thoroughly and thereby assist the Court in resolving the Motion to Dismiss.

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Hon. Gary R. Brown, District Judge

We thank the Court in advance for its consideration of these requests.

Respectfully submitted,

/s/ Ashley J. Hale

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